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6 Attorney for Gustavo Navaro

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**
9

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 GUSTAVO NAVARO,

14 Defendant.

Case No. 2:15-cr-180-RFB

**STIPULATION TO RESET
SENTENCING DATE**
(First Request)

15
16 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
17 United States Attorney, and Lisa Cartier-Giroux, Assistant United States Attorney, counsel for
18 the United States of America, and Rene L. Valladares, Federal Public Defender, and Heidi A.
19 Ojeda, Assistant Federal Public Defender, counsel for Gustavo Navaro, that the sentencing
20 hearing currently scheduled for January 19, 2016, be vacated and reset to a date and time
21 convenient to the Court, but no earlier than thirty (30) days.

22 This Stipulation is entered into for the following reasons:

23 1. The Pre-sentence Report has been disclosed to the parties and there are no
24 objections or corrections that need to be made. The parties are ready to proceed with
25 sentencing.
26

2. Sentencing in this matter is currently set for Tuesday, January 19, 2016. Mr. Navaro is requesting that the Court reset his sentencing date for the next available Thursday or Friday. Mr. Navaro's wife works Monday through Wednesday, and will only be able to attend his sentencing if it is set on a Thursday or Friday.

3. The parties additionally ask that this Court set this matter at the next available Thursday or Friday after January 11, 2015, as the Government counsel is in trial the first week of January.

4. The parties agree to the sentencing hearing being reset.

This is the first request to reset the sentencing date filed herein.

DATED this 28th day of December, 2015

RENE L. VALLADARES
Federal Public Defender

DANIEL G. BOGDEN
United States Attorney

/s/ Heidi A. Ojeda
By _____

HEIDI A. OJEDA
Assistant Federal Public Defender

/s/ Lisa Cartier-Giroux
By _____

LISA CARTIER-GIROUX
Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**

2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 GUSTAVO NAVARO,

7 Defendant.

Case No. 2:15-cr-180-RFB

FINDINGS OF FACT, CONCLUSIONS
OF LAW AND ORDER

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10 **FINDINGS OF FACT**

11 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
12 Court finds that:

13 1. The Pre-sentence Report has been disclosed to the parties and there are no
14 objections or corrections that need to be made. The parties are ready to proceed with
15 sentencing.

16 2. Sentencing in this matter is currently set for Tuesday, January 19, 2016. Mr.
17 Navaro is requesting that the Court reset his sentencing date for the next available Thursday or
18 Friday. Mr. Navaro's wife works Monday through Wednesday, and will only be able to attend
19 his sentencing if it is set on a Thursday or Friday.

20 3. The parties additionally ask that this Court set this matter at the next available
21 Thursday or Friday after January 11, 2015, as the Government counsel is in trial the first week
22 of January.

23 4. The parties agree to the sentencing hearing being reset.

ORDER

IT IS FURTHER ORDERED that the sentencing hearing currently scheduled for January 19, 2016, at 10:30 a.m., be vacated and reset to 2/19/2016 at the hour of 10 : 30 a.m.

DATED this 4th day of January, 2016.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE